

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARY ABSHIER,

Plaintiff,

- vs. -

SUNSET RECORDINGS, INC., SUNSET MUSIC  
PUBLISHING, SUNSET CONNECT, S2  
ENTERTAINMENT, INC., and  
DON LICHTERMAN,

Defendants.

Civil Action No. 14-CV-3227 (CM)(SN)

**NOTICE OF MOTION FOR A  
DEFAULT JUDGMENT OF  
LIABILITY AGAINST  
ALL DEFENDANTS**

PLEASE TAKE NOTICE, that Plaintiff/Counter-Defendant Mary Abshier (“Plaintiff”), upon the Levine Declaration, the Accompanying Memorandum of Law, and all prior papers and proceedings, shall, pursuant to Fed. R. Civ. P. 55, and the Court’s Individual Rules of Practice, move this Court, before the Honorable Colleen McMahon, at the United States Courthouse, 500 Pearl Street, Courtroom 17C, New York, New York, 10007, at a date and time designated by the Court, for an Order: (a) entering a default judgment of liability against Defendants Sunset Recordings, Inc., Sunset Music Publishing, Sunset Connect, S2 Entertainment, Inc. and Don Lichterman; (b) entering a default judgment dismissing Defendant Lichterman’s Counterclaims with prejudice; (c) scheduling an inquest on damages and other relief sought by

Plaintiff; and (d) awarding such other and further relief as the Court deems just.

Dated: November 5, 2014  
New York, New York

Respectfully submitted,

**LAW OFFICES OF MATTHEW L. LEVINE, PLLC**

By: \_\_\_\_\_/s/\_\_\_\_\_

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